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VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gregoire Tournant*, 22-cr-276 (LTS)

Dear Chief Judge Swain,

We respectfully submit this letter on behalf of Defendant Gregoire Tournant regarding the conditions of Mr. Tournant's bail package. Specifically, we write to update the Court on the "mechanism for immediate liquidation" of Mr. Tournant's retirement account and the cash value of his life insurance policies "in the event of a violation of the terms of pretrial release." (*See* ECF No. 11.)

Mr. Tournant has completed paperwork that grants power of attorney to his counsel allowing counsel to direct the immediate liquidation of Mr. Tournant's retirement account and to obtain the cash value of his life insurance policies should the Court order counsel to do so. We have discussed this mechanism with the Government, it is consistent with our prior conversations on this issue, and we understand the Government has no objection to proceeding in this manner. Further, Mr. Tournant and counsel have submitted power of attorney paperwork to the two financial institutions at which the retirement account and life insurance policies are held. As of this afternoon, we understand that one of the financial institutions has accepted the power of attorney paperwork, and the other is in the process of finalizing the paperwork.

If we should learn any new information from either financial institution that prevents these mechanisms from being put in place, we will confer with the Government and inform the Court.

Respectfully Submitted,

/s/ Seth L. Levine
Seth L. Levine

cc: Counsel for all parties (via ECF)
Lea M. Harmon, Pretrial Services Officer (via e-mail)